



## Los Angeles Regional Water Quality Control Board

September 19, 2013

Mr. Jeffrey Stanek  
ITT Corporation  
1054 North Tustin Avenue  
Anaheim, California 92807

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED  
7012 3460 0001 6365 8202

**SUBJECT: RESPONSE COMMENTS TO THE SUBSURFACE INVESTIGATION WORKPLAN, PURSUANT TO CALIFORNIA WATER CODE SECTION 13304 CLEANUP AND ABATEMENT ORDER NO. R4-2003-0128R**

**SITE: FORMER ITT INDUSTRIES/GENERAL CONTROLS FACILITY, 1200 SOUTH FLOWER STREET, BURBANK, CALIFORNIA (FILE NO. 109.0582; SITE ID NO. 2041800)**

Dear Mr. Stanek,

The California Regional Water Quality Control Board, Los Angeles Region (Regional Board) staff have reviewed the *Revised Additional Off-Site Upgradient Groundwater Investigation Workplan* (Workplan) dated July 11, 2013, submitted by Environ International Corporation (Environ) on your behalf for the referenced site. The Workplan was submitted in compliance with the Regional Board's California Water Code (CWC) Section 13304 Cleanup and Abatement Order No. R4-2003-0128R dated 23 February 2007.

### COMMENTS AND REQUIREMENTS

Regional Board technical staff have reviewed the proposed scope of work (SOW), and have determined that there is potential risk of further degradation of the regional aquifer posed by the proposed drilling through a saturated media (perched groundwater) zone which overlies a fine grained stratigraphic unit (FGSU), essentially viewed as an aquiclude or confining zone. This FGSU is located directly above the upper zone of the regional groundwater aquifer. The perched water zone is known to contain chemicals of concern (COCs) which have been released from the ITT Corporation facility (Site) as well as adjacent sites (i.e., former Menasco Aerospace). These COCs could migrate downward to the regional groundwater aquifer if the FGSU is compromised without proper controls being employed during drilling activities. Based on this potential and significant risk, Regional Board staff has concluded that the proposed SOW requires additional discussion and further evaluation of alternative field methods prior to the SOW being approval by this agency.

Therefore, due to the potential and significant risk of further degradation to the regional groundwater aquifer, the Regional Board is requiring the following conditions prior to approving the SOW and Workplan:

1. A formal notification of the intent regarding the proposed SOW and Workplan be provided to all stakeholders, including the United States Environmental Protection Agency (USEPA), United Technologies, Metropolitan Transit Authority (MTA), and the Glendale Respondents Group. This notification shall occur within 30 calendar days prior to the proposed meeting as stated in line item #2 below;
2. Meet with Regional Board staff and other interested stakeholders. The meeting shall include a detailed explanation of the precautions and procedures which will be implemented to protect the integrity of the FGSU and how the procedures will reduce the risk of further degradation of the regional groundwater aquifer; and
3. Once the proposed procedures (discussed in the meeting in item #2) are discussed by the Regional Board, USEPA, and other stakeholders, ITT shall revise the SOW and Workplan and submit the Workplan to the Regional Board within 90 calendar days of the meeting referenced above for review and approval by Regional Board staff.

The due date for the submittal of the workplan cited in line item #3 above constitutes an amendment to the requirements of Cleanup and Abatement Order No. R4-2003-0128R originally dated February 7, 2003. All other aspects of Order No. R4-2003-0128 originally dated May 14, 2004, and amendments thereto, remain in full force and effect. Pursuant to section 13350 of the California Water Code, failure to comply with the requirements of Order No. R4-2003-0128 by the specified due date, including dates in this amendment, may result in civil liability administratively imposed by the Regional Board in an amount up to five thousand dollars (\$5000) for each day of failure to comply."

The Regional Board, under the authority given by Water Code section 13267(b)(1), requires you to include a perjury statement in all reports submitted under this Order. The perjury statement shall be signed by a senior authorized representative (not by a consultant). The perjury statement shall be in the following format:

"I, [NAME], certify under penalty of law that this document and all attachments were prepared by me, or under my direction or supervision, in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

The State Board adopted regulations (Chapter 30, Division 3 of Title 23 & Division 3 of Title 27, California Code of Regulation) requiring the electronic submittal of information (ESI) for all site cleanup programs, starting January 1, 2005. Currently, all of the information on electronic submittals and GeoTracker contacts can be found on the Internet at the following link:

[http://www.waterboards.ca.gov/ust/electronic\\_submittal](http://www.waterboards.ca.gov/ust/electronic_submittal).

To comply with the above referenced regulation, you are required to upload all technical reports, documents, and well data to GeoTracker by the due dates specified in the Regional Board letters and

orders issued to you or for the Site. However, the Regional Board may request that you submit hard copies of selected documents and data in addition to electronic submittal of information to GeoTracker.

**Should you have any questions related to this project, please contact Mr. Larry Moore via telephone at (213) 576-6730 or via email at [Lawrence.Moore@Waterboards.ca.gov](mailto:Lawrence.Moore@Waterboards.ca.gov).**

Sincerely,



Samuel Unger, P.E.  
Executive Officer

cc: Ms. Lisa Hanusiak, USEPA Region 9  
Mr. Leo Chan, City of Glendale  
Mr. Bill Mace, City of Burbank Water Supply Department  
Mr. Vahe Dabbaghian, Los Angeles Department of Water & Power  
Mr. Milad Taghavi, Los Angeles Department of Water & Power  
Mr. Richard Slade, ULARA Watermaster  
Ms. Carol Serlin, Environ  
Ms. Teresa Olmsted, ITT Corporation  
Mr. Jeff Raumin, Environ  
Mr. Bruce Amig, United Technologies  
Mr. Chris Liban, MTA